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Attorney for Plaintiff DELA CRUZ

FILED
Clerk
District Court

APR 28 2008

For The Northern Mariana Islands
By _____
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

RYANJAY T. DELA CRUZ,

Plaintiff,

vs.

ROME RESEARCH CORPORATION,

Defendant.

CIVIL ACTION NO: CV08-0020

**PLAINTIFF'S CASE MANAGEMENT
CONFERENCE STATEMENT**

COMES NOW, Plaintiff RYANJAY T. DELA CRUZ, through counsel Joey P. San Nicolas, Esq. and hereby submits this Case Management Conference Statement pursuant to Local Rule 16.2J(e)(2) and Fed. R. Civ. P.16(b) and (c).

- (A) Service of Process on Parties: All parties have been served.
- (B) Jurisdiction and Venue—Plaintiff DELA CRUZ contests the court's jurisdiction in this matter and contests venue.
- (C) Track Assignment—Plaintiff DELA CRUZ is of the position that this matter should be assigned to the Expedited Track as defined by Local Rule 16.2cJ(c).
- (D) Anticipated Motions—Plaintiff DELA CRUZ anticipates filing dispositive motions in this case.
- (E) Anticipated Discovery—Plaintiff DELA CRUZ anticipates propounding Interrogatories

1 and Requests for Production of Documents, additionally Plaintiff DELA CRUZ
2 anticipates deposing all parties and witnesses named by Defendant. Plaintiff DELA
3 CRUZ may engage expert witnesses.

4 (F) Further Proceedings, including dates for discovery cut-off, pre-trial and trial-Plaintiff
5 DELA CRUZ will comply with all dates set by the Court and fully understands that all
6 dates will depend upon the track to which this case is assigned.

7 (G) There are no companion cases with which to consolidated this action for the purposes of
8 discovery or pre-trial. As this matter is not overly complex no special master is
9 necessary. This matter does not require the application of the Manual for Complex
10 Litigation.

11 (H) Standard pre-trial procedures should apply subject to modification if this matter is set to
12 the Expedited Track.

13 (I) The prospect for settlement in this matter is low at this time.

14 (J) Reference to a settlement judge may obviate the need to litigate this matter.

15 (K) Plaintiff DELA CRUZ will agree to all reasonable proposals for controlling dates in this
16 matter.

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18 RESPECTFULLY SUBMITTED this ____ day of April, 2008.

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20 LAW OFFICES OF JOEY P. SAN NICOLAS

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22 JOEY P. SAN NICOLAS, Esq. (F-0342)
23 Attorney for Plaintiff DELA CRUZ
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